

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:
NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUIÑONES

Debtors

IN RE:
NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUIÑONES

Plaintiffs

vs.

COOPERATIVA DE AHORRO Y CREDITO
NUESTRA SEÑORA DE LA CANDELARIA; X,
Y, and/or Z INSURANCE CO.; JOHN DOE AND
JANE ROE

Defendants

JOSE CARRION MORALES
CHAPTER 13 TRUSTEE/PARTY IN INTEREST
CASE 11-02484-BKT

Case No. 98-10612 (ESL)

CHAPTER 13

Adv. No. 11-00151- ESL

VIOLATION OF DISCHARGE
INJUNCTIVE RELIEF / CONTEMPT
/ DAMAGES

INFORMATIVE MOTION

TO HONORABLE COURT:

Come now, Cooperativa de Ahorro y Crédito La Candelaria (hereinafter Candel Coop), that respectfully states, prays, and requests as follows:

In the case at bar the Court granted the Defendant until June 25, 2012 to submit the Opposition to the Motion for Summary Judgment submitted by the Plaintiff. We have the Opposition ready but could not submit it yesterday because the Cooperativa La Candelaria

employee who was going to sign the Statement under Penalty of Perjury in support of the Defendant was not able to arrive yesterday at his office due to mechanical problems with his car. He lives in Morovis and could not arrange to be able to get to Manatí to Candel Coop. He will be at work at his office today to sign and submit to us the Statement to file the Opposition today.

WHEREFORE, it is respectfully requested from the Court to take notice of this information for all pertinent legal purposes and to allow the filing of the Opposition with all of the corresponding statements today.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of November, 2011.

I hereby certify that on this same date a true and exact copy of this motion was sent to Edwin Matos Maldonado and Felix Zeno Gloró through the Electronic Case Management System just as to: Nancy Pujals, Esq.- nancy.pujals@usdoj.gov; Monsita Lecaroz, Esq. - monsita.lecaroz@usdoj.gov.

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